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Attorneys for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DZ RESERVE and CAIN MAXWELL (d/b/a MAX MARTIALIS), individually and on behalf of all others similarly situated,

Plaintiffs,

V.

META PLATFORMS, INC.,

Defendant.

Case No. 3:18-cv-04978 JD

**DECLARATION OF STEVEN
TADELIS, PH.D.**

Date: June 23, 2022

Time: 10:00 a.m.

Court: Courtroom 11, 19th Floor
Hon. James Donato

1 I, Steven Tadelis, declare as follows:

2 1. I have been retained by the law firm of Latham & Watkins LLP, counsel of record
3 for Defendant Meta Platforms, Inc. ("Meta") in the above-entitled action, to review and evaluate
4 certain opinions presented in expert reports submitted by Plaintiffs in this matter. I have personal
5 knowledge of the matters stated herein and, if called upon, I could and would competently testify
6 thereto.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the March 3, 2021,
8 rebuttal expert report that I submitted in this matter, along with certain updated exhibits that were
9 submitted in connection with the parties' briefing on Plaintiffs' motion for class certification.
10 Specifically, Exhibit 1 includes:

- 11 • Four exhibits (Updated Tadelis Exhibits 17-20) that were previously attached to the May
12 14, 2021 Declaration of Melanie M. Blunschi (Dkt. 296) and filed at Dkt. 296-71. These
13 exhibits updated exhibits to my March 3 report based on the class definition identified in
14 Plaintiffs' motion for class certification (Dkt. 282 at 15);
15 • Four exhibits that were attached as Exhibits 3-6 to my May 14, 2021 Declaration (Dkt. 298)
16 and filed at Dkts. 298-3 to 298-6. These exhibits have been re-titled as Exhibits 39-42 for
17 purposes of this Declaration.

18 I adopt and incorporate the opinions in Exhibit 1 as though fully set forth in this declaration, and,
19 if called upon, I could and would testify to the same in an evidentiary hearing or at trial.

20 3. Attached hereto as **Exhibit 2** is a true and correct copy of my April 5, 2021,
21 response to certain information contained in the March 19, 2021 Expert Report of Charles D.
22 Cowan, Ph.D. I adopt and incorporate the analyses in that response as though fully set forth in this
23 declaration, and, if called upon, I could and would testify to the same in an evidentiary hearing or
24 at trial.

25 I declare under penalty of perjury that the foregoing is true and correct, and that I executed
26 this Declaration on March 3, 2022, in Berkeley, California.

27 By: 
28 Steven Tadelis, Ph.D.